REMARKS

Claims 1 to 11 and 13 to 15 are pending in the application, of which Claims 1, 10, 14 and 15 are independent. Reconsideration and further examination are respectfully requested.

Claims 1 to 11 were rejected under 35 U.S.C. § 101 as not falling within one of the four statutory categories of invention. Without conceding the correctness of the rejection, Applicants have amended the claims to clarify that the method is tied to a statutory category as required under the USPTO's current guidelines. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

Claims 1 to 3, 5 to 9 and 13 to 15 were rejected under 35 U.S.C. § 103(a) over U.S. Published Appln. No. 2004/0201613 (Simpson) in view of U.S. Patent No. 6,978,445 (Laane), and in further view of U.S. Patent No. 6,832,351 (Batres). Claim 4 was rejected under 35 U.S.C. § 103(a) over Simpson in view of Laane, in further view of Batres, and in further view of U.S. Published Appln. No. 2002/0046238 (Estavillo). Claim 10 was rejected under 35 U.S.C. § 103(a) over Simpson in view of Laane, in further view of Batres, and in further view of U.S. Published Appln. No. 2002/0143814 (Hepworth). Claim 11 was rejected under 35 U.S.C. § 103(a) over Simpson in view of Laane, in further view of Batres, in further view of Hepworth, and in further view of U.S. Patent No. 7,047,033 (Wyler). Applicants respectfully traverse the rejections under 35 U.S.C. § 103(a) on the following grounds.

The present claims concern the dynamic adjustment of the scale of individual frames of a framed webpage so that the webpage can be faithfully reproduced on a print media in the fashion in which it would be otherwise seen on a display screen.

In regard to specific claim language, representative Claim 1 is directed to a computer-implemented method of forming a printable representation of a document having framed content, the computer including a processor, a memory and a display device each coupled to the processor, the document being displayed by the processor upon the display to represent the framed content. The method includes the steps of: (a) recording in the memory a position, height and width of each frame of said document in a display widow of the display device in which said document is presented; (b) identifying using the processor dimensions of a printing medium associated with said printable representation; (c) determining using the processor a height of content of each said frame; (d) determining using the processor, for each said frame, a record of any corresponding dependency frames, each said dependency frame being above said frame in said display window;(e) interpreting using the processor the records to establish a display order of said frames; (f) for each said frame, and in said display order, using the processor to: (fa) check a start position of said frame against an end position of a created display region of a frame upon which said frame is dependent, and setting said start position to be said end position; (fb) create a display region upon a page in said printable representation at said start position according to said corresponding content height; (fc) place the content of said frame into said display region; and (fd) where said display region exceeds a page limit in said printable representation, terminate the display region at the page limit and create a further display region upon a following page of the printable representation so as to span the content of said frame across the display region and the further display region; and (g) one of store the printable representation in the memory and transmit the printable representation to a printer for printing.

In contrast to the present invention, Simpson discloses a system that allows a user to manually arrange content on a page that can be then saved or printed. Laane discloses

loading a page and is not at all concerned with printing of displayed pages in order to preserve layout. As conceded in the Office Action, no permissible combination of Simpson and Laane discloses or suggests the feature of the claims wherein said display region exceeds a page limit in said printable representation, terminating the display region at the page limit and creating a further display region upon a following page of the printable representation so as to span the content of said frame across the display region and the further display region. However, the Office Action cited Batres as disclosing such a feature. Applicants respectfully disagree with such a reading of Batres for the following reasons.

Batres concerns a method of constructing a page, such as an invoice, that utilizes HTML and OLE components so that the page is both viewable and printable, without the need for sophisticated user control. In contrast, the present invention concerns printing a webpage in a fashion to match the presentation of the webpage on the display screen, and without the need to construct the webpage in any special way. In particular, Batres discloses the creation, editing and manipulation of customized pages for printout, especially business forms such as invoices and billing statements. To do so, Batres discloses taking data received or retrieved from an invoice that is too large to be displayed on a single page and converting the data into HTML which can then be loaded to a template that is able to handle the span of pages for the document.

Furthermore, in Batres there is no disclosure that the actual printed document will look the same as that of the input or source document which, as interpreted by the process of Batres, requires some amount of reformatting for printing. In contrast, according to the present invention, the "document" is a document intended to be displayed on a display screen, within a web browser for example. Therefore, the document specifically includes "framed content."

Applicants submit that there is nothing in Batres that discloses that content is actually "framed" as featured in the claims.

In view of the limitations of Simpson, Laane and Batres as discussed above, Applicants respectfully submit that Claim 1 is now in condition for allowance and respectfully request same.

Claims 10, 14 and 15 are directed to a method, a computer-readable storage medium, and a system, respectively, substantially in accordance with the method of Claim 1. Accordingly, Applicants submit that Claims 10, 14 and 15 are also in condition for allowance and respectfully request same.

The other pending claims in this application are each dependent from the independent claims discussed above and are therefore believed allowable for at least the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

CONCLUSION

The Director is authorized to charge the \$130 one-month extension fee to

Deposit Account No. 50-3939.

No claim fees are believed due; however, should it be determined that

additional claim fees are required, the Director is hereby authorized to charge such fees to

Deposit Account 06-1205.

Applicants' undersigned attorney may be reached in our Costa Mesa, CA

office at (714) 540-8700. All correspondence should continue to be directed to our below-

listed address.

Respectfully submitted,

/Frank Cire #42,419/

Frank L. Cire

Attorney for Applicants

FITZPATRICK, CELLA, HARPER & SCINTO

30 Rockefeller Plaza

New York, New York 10112-3800

Facsimile: (212) 218-2200

FCHS_WS 3873846v1

- 13 -